

EXHIBIT K

A. BRUNO LAW

ALYSSA M. BRUNO, ESQ.

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EASTON, PA 18044

April 9, 2024

Alice Temperley MBE
1 Cornhill Market Place
Ilminster, United Kingdom
TA19 0AD

ROMO Inc. t/a ROMO Fabrics and Wallcoverings
Frederic Henry, CEO
Agent: O.R.C. Statutory Services Corp.
600 Superior Ave., E
Suite 1400
Cleveland OH 44114
Entity No.: 795419

TMLL Limited
Luca Donnini, CEO
Alice Temperley MBE, Creative Director
1 Cornhill Market Place
Ilminster, United Kingdom
TA19 0AD
Company No.: 13356817

The Romo Group Limited
Jonathan Mould, CEO
Oddicroft Lane
Sutton-in-Ashfield
Nottinghamshire, England
NG17 5FB
Company No.: 14451746

Temperley Holdings Limited
Ritesh Punjabi, CEO
1 Cornhill
Ilminster, England
TA19 0AD
Company No.: 07094663

ROMO Limited
Jonathan Mould, CEO
Oddicroft Lane
Sutton-in-Ashfield
Nottinghamshire, England
NG17 5FB
Company No.: 00385709

Romo (Holdings) Limited
Jonathan Mould, CEO
Oddicroft Lane
Sutton-in-Ashfield
Nottinghamshire, England
NG17 5FB
Company No.: 02583111

RE: Cease-and-Desist Demand concerning Your Copyright Infringement of Sophia Parker Studios, Inc.'s Sculpture entitled "Memphis Chainsaw" (U.S. Copyright Registration No. VA 2-342-734) and Group of Photographs (U.S. Copyright Registration No. VA 2-352-960); CONFIDENTIAL DOCUMENT; All rights are reserved on behalf of Sophia Parker Studios, Inc.

Dear Alice Temperley, Temperley London, and ROMO:

I represent Sophia Parker Studios, Inc. in the above-captioned matter. The CEO of Sophia Parker Studios, Inc. is Sophia Parker, a visual artist based in New York City who specializing in plant-based artworks and immersive botanical sculptures. My client is the author of the original sculptural artwork entitled, "Memphis Chainsaw," which is a botanical sculpture that features two

stems of a specific type of palm that have been heavily altered, shaped, and intricately hand-painted by my client. This sculpture is a registered work of art with the U.S. Copyright Office (U.S. Copyright Registration No. VA 2-342-734). See Exhibit A. My client is also the author of three (3) published original photographs of the sculpture, which were first displayed on her widely distributed and well known Instagram account, @wifeny, between September 2019 and November 2019. See Exhibit B. These three (3) original photographs are registered works of art with the U.S. Copyright Office (U.S. Copyright Registration No. VA 2-352-960). See Exhibit C.

We are aware that Alice Temperley, individually, TMLL Limited, Temperley Holdings Limited (collectively referred to as “**Temperley London**”), and ROMO Inc. t/a ROMO Fabrics & Wallcoverings, The Romo Group Limited, ROMO Limited, Romo (Holdings) Limited (collectively referred to as “**ROMO**”) have copied, reproduced, distributed, displayed, sold, and created derivative versions of my client’s original artworks on a massive and global scale without my client’s consent and without any payment being made to her. **All of these actions constitute illegal copyright infringement, which is actionable under the U.S. Copyright Act.** My client intends to protect and enforce her intellectual property rights in her artworks.

I. Temperley London SS 2022 Collection – Product Infringements

The first known instances of your infringement of my client’s artworks are found in Temperley London’s SS 2022 collection. This collection features various apparel items in the “Farrah” story that include exact replicas of my client’s “Memphis Chainsaw” sculptural work on the front, back, and sides of the pieces. Specifically, the dimensions and shape of the sculpture as well as the intricate design pattern and color scheme of my client’s artwork was copied verbatim and then incorporated into several apparel products without my client’s consent and without any payment being made to her. The Temperley London infringing products at issue in this claim include the following:

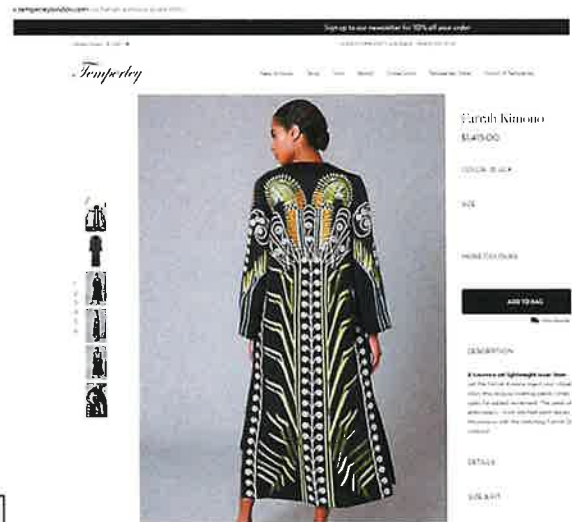
- 1) Farrah Kimono (\$1,415.00) – *colorways: black, pastel parchment, pale lilac*



“Memphis Chainsaw” sculpture by
Sophia Parker Studios, Inc.



Infringing Temperley London
“Farrah Kimono”



Infringing Temperley London
“Farrah Kimono” on
Temperley London’s website

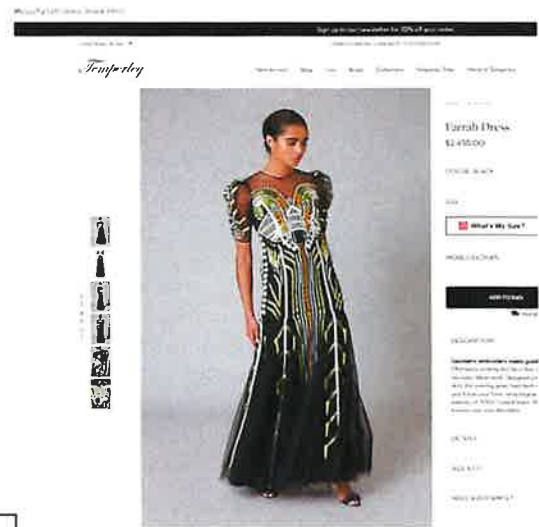
2) Farrah Dress (\$2,455.00) – colorways: pastel parchment, black, pale lilac



“Memphis Chainsaw” sculpture by Sophia Parker Studios, Inc.



Infringing Temperley London “Farrah Dress”



Infringing Temperley London “Farrah Dress” on Temperley London’s website

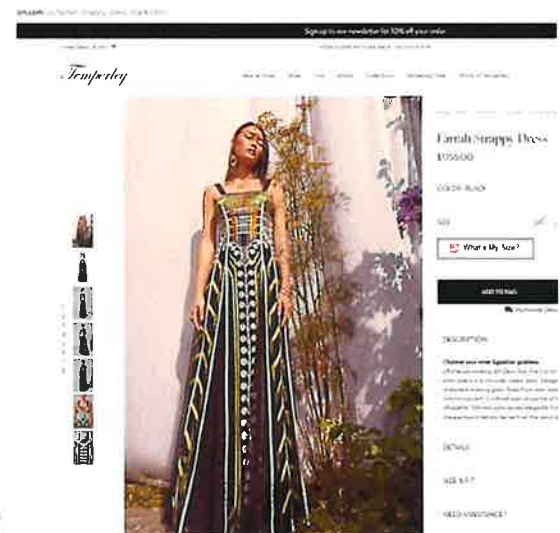
3) Farrah Strappy Dress (\$2,310.00) – colorways: black and pastel parchment



“Memphis Chainsaw” sculpture by Sophia Parker Studios, Inc.



Infringing Temperley London “Farrah Strappy Dress”



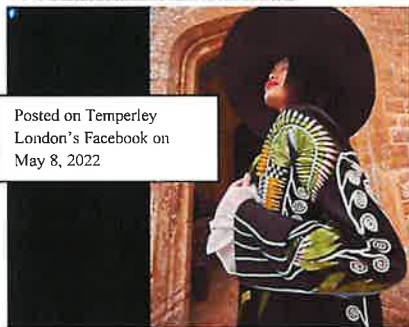
Infringing Temperley London “Farrah Strappy Dress” on Temperley London’s website

It is also clear that my client’s artworks served as the basis for the Temperley London SS 2022 Palmae print line, including the Palmae Print Jacket, Palmae Print Coat, Palmae Print Dress, Palmae Print Long Kaftan, and Palmae Print Trouser.

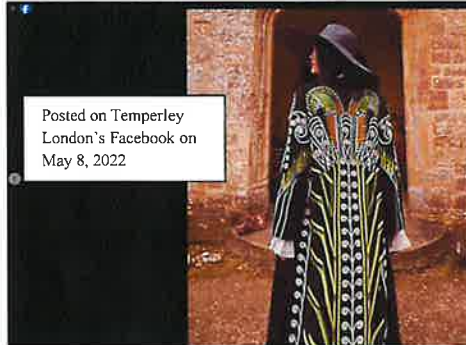
II. Temperley London SS 2022 Collection – Advertisement Infringements

In addition to the unauthorized Temperley London SS 2022 apparel items featuring my client's artworks, Alice Temperley, Temperley London, ROMO, and others displayed and distributed numerous photographs, videos, Instagram posts/stories, Facebook posts, email newsletters, website listings, and other advertisements and social media posts featuring unauthorized derivatives of my client's artworks in connection with the promotion of the Temperley London SS 2022 collection and the Temperley London x ROMO interiors collection. Each unauthorized use of my client's work constitutes a separate act of copyright infringement to which monetary damages will be awarded.

Here are a few of the many infringing derivative works:



Posted on Temperley London's Facebook on May 8, 2022



Posted on Temperley London's Facebook on May 8, 2022



Posted on Temperley London's IG on May 7, 2022



Posted on Alice Temperley's IG on July 4, 2020



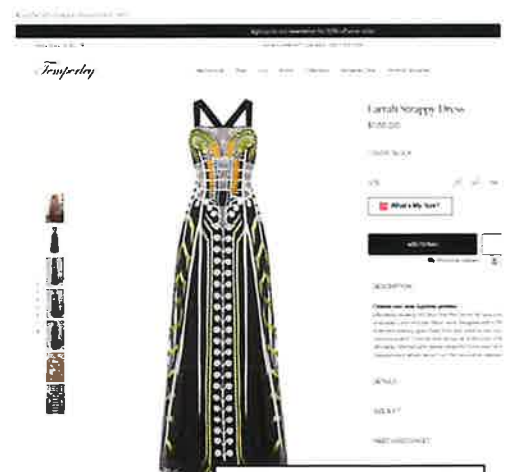
Posted on Temperley London's IG on May 7, 2022



Posted on Alice Temperley's IG on January 7, 2024



Posted on ROMO's IG stories promoting Temperley London x ROMO launch



Listing for the "Farrah Strappy" Dress on Temperley London's website

III. Temperley London x ROMO Collection – Product Infringements

Given the apparent success of the Temperley London “Farrah” apparel items in Temperley London’s SS 2022 collection, my client’s “Memphis Chainsaw” sculpture was again copied and incorporated into the Temperley London x ROMO interiors collection, which launched in March 2023. Specifically, the dimensions and shape of the sculpture as well as the intricate design pattern and color scheme of my client’s work was copied verbatim and then incorporated into several products in the Temperley London x ROMO interiors collection without my client’s consent and without any payment being made to her. The Temperley London x ROMO infringing products at issue in this claim include the following:

1) “Farrah Agave” Fabric



“Memphis Chainsaw” sculpture by Sophia Parker Studios, Inc.



Infringing Temperley London x ROMO “Farrah Agave” Fabric



Farrah Agave

©2013/01

Temperley London x ROMO
Copyright © 2023 Temperley London x ROMO

Infringing Temperley London x ROMO “Farrah Agave” Fabric on ROMO’s website

2) “Farrah Lilac Ash” Fabric



“Memphis Chainsaw” sculpture by Sophia Parker Studios, Inc.



Infringing Temperley London x ROMO “Farrah Lilac Ash” Fabric



Farrah Lilac Ash

©2013/02

Temperley London x ROMO
Copyright © 2023 Temperley London x ROMO

Infringing Temperley London x ROMO “Farrah Lilac Ash” Fabric on ROMO’s website

3) "Farrah Agave" Cushion

ROMO



Farrah 60cm x 40cm Cushion Agave

RC765/01

Collection Temperley London x Romo - Farrah

"Memphis Chainsaw" sculpture by
Sophia Parker Studios, Inc.

Infringing Temperley London
x ROMO "Farrah Agave"
Cushion

Infringing Temperley London
x ROMO "Farrah Agave"
Cushion on ROMO's website

4) "Farrah Lilac Ash" Cushion

ROMO



Farrah 60cm x 40cm Cushion Lilac Ash

RC765/02

Collection Temperley London x Romo - Farrah

"Memphis Chainsaw" sculpture by
Sophia Parker Studios, Inc.

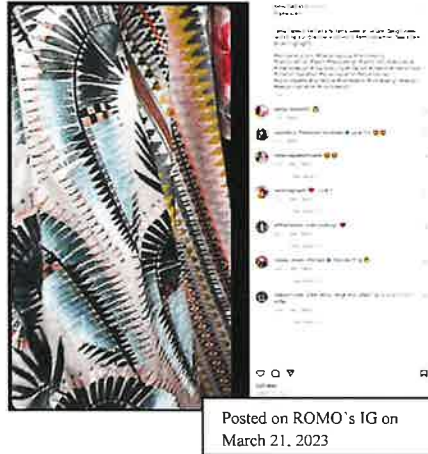
Infringing Temperley London
x ROMO "Farrah Lilac Ash"
Cushion

Infringing Temperley London
x ROMO "Farrah Lilac Ash"
Cushion on ROMO's website

IV. Temperley London x ROMO Collection – Advertisement Infringements

In addition to the unauthorized Temperley London x ROMO interiors products featuring my client's artworks, Alice Temperley, Temperley London, ROMO, and others displayed and distributed numerous photographs, videos, Instagram posts/stories, Facebook posts, email newsletters, website listings, and other advertisements and social media posts featuring unauthorized derivatives of my client's artworks in connection with the promotion of the Temperley London x ROMO collection. Each unauthorized use of my client's work constitutes a separate act of copyright infringement to which monetary damages will be awarded.

Here are a few of the many infringing derivative works:



Under the U.S. Copyright Act, an original work of art qualifies for copyright protection the moment it is created, and the author or owner of that work possesses the *exclusive right* to sell, reproduce, display, copy, distribute, and create derivative versions of that work. In instances where a third party violates a copyright holder's exclusive rights by selling, reproducing, displaying, copying, distributing, or creating derivative versions of the work without first obtaining consent from the copyright holder to do so, the law provides that the infringer shall be held liable for actual monetary damages and the disgorgement of their profits, or statutory damages, plus attorneys' fees and costs. See 17 U.S.C. §§ 504 and 505. The law further provides that the unauthorized reproduction of an original author's artwork on different mediums and using different stylistic choices still constitutes copyright infringement. See Andy Warhol Foundation for the Visual Arts, Inc. v. Goldsmith, 598 U.S. 508 (U.S. 2023) (holding that the unauthorized licensing of the "Orange Prince" silkscreen created by Andy Warhol did not constitute fair use of photographer Lynn Goldsmith's original photograph).

You are hereby put on notice that because you do not have permission from my client to reproduce her copyright-protected "Memphis Chainsaw" sculpture or the copyright-protected photographs of the same, **you must immediately cease and forever desist any further reproduction, display, distribution, creation of derivative works, and sale of the infringing products listed above. You must further remove and/or delete all forms of infringing advertisements, product listings, social media posts/stories, etc. displaying the above-mentioned infringing products. Additionally, please be on notice that my client is seeking compensatory relief in the form of actual damages and the disgorgement of Temperley London's and ROMO's profits related to the sale of the aforementioned infringing products (i.e. all colorways of the "Farrah Kimono," "Farrah Dress," "Farrah Strappy Dress," "Farrah Agave" Fabric, "Farrah Lilac Ash" Fabric, "Farrah Agave" Cushion, and "Farrah Lilac Ash" Cushion), plus damages for the infringing photos/videos posted on your respective websites/social media accounts, etc. and attorneys' fees and costs.**

At this time, my client is amenable to resolving this matter through settlement discussions; however, if a prompt settlement is not reached, we are prepared to initiate litigation in federal court for copyright infringement and the display of false copyright management information, among other claims. If you would like to resolve this matter prior to the initiation of litigation, please provide my office with an accounting of the gross revenue received by Temperley London and ROMO from the sale of the aforementioned products and any other products that replicate my client's artworks by **April 26, 2024**. Finally, please be on notice that any and all documents and communications (electronic and paper), including any emails, texts, contracts, invoices, business records, accounting information, photographs, videos, audio recordings, design boards, design sketches, design renderings, materials, etc., and any other information or objects created or in the possession of Alice Temperley, Temperley London, ROMO, or any other person/entity relating to this matter in any way must be preserved and not altered. Any destruction or lack of preservation of evidence will be considered illegal spoliation.

I look forward to receiving your response.

Sincerely,



Alyssa M. Bruno, Esq.

Exhibit A – “Memphis Chainsaw” Sculpture by Sophia Parker Studios, Inc.
(U.S. Copyright Registration No. VA 2-342-734)

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Spiria Perlmuter

United States Register of Copyrights and Director

Registration Number

VA 2-342-734

Effective Date of Registration:

February 28, 2023

Registration Decision Date:

April 20, 2023

Title

Title of Work: Memphis Chainsaw

Completion/Publication

Year of Completion: 2019
Date of 1st Publication: September 30, 2019
Nation of 1st Publication: United States

Author

Author: Sophia Parker Studios, Inc.
Author Created: sculpture
Work made for hire: Yes
Citizen of: United States
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Sophia Parker Studios, Inc.
1651 Cody Ave., Flushing, NY, 11385, United States

Rights and Permissions

Organization Name: A. Bruno Law
Name: Alyssa M. Bruno
Email: abruno@abrunolaw.com
Telephone: (610)258-4003
Address: P.O. Box 468
Easton, PA 18044 United States

Certification

Name: Alyssa M. Bruno, Esq.
Date: February 28, 2023

Correspondence: Yes



Exhibit B – Instagram Posts by Sophia Parker Studios, Inc.
Instagram handle, @wifeny



wehenyc @ • Forum
Like Reply

wehenyc @ im starting a country This is the flag.
23m

jammunyc @ can i get citizen ship?
11m Reply

tracynoads1936 So funny
22m Reply

lanaaplant @ Green is for
21m Like Reply

RahmaK1103 @ gahgahgah
27m Reply Like Retweet

claire leforster So good
23m Reply

ruafelcitz
12m Reply

WendyKling @ in pro
22m Like Reply

adventist @ gahgahgah
23m Like Reply

klaspender
11m Reply

apetitefordecoration i'm moving to the country!
11m Reply

die entzuecke flora Amazing
23m Reply

amhalling @ in
22m Reply

klaspender @ Oh, how do i apply for citizen ship?
27m Reply

2,713 likes
September 20, 2024

Add a comment



Instagram post interface showing a list of comments and a share button.

Comments:

- whitney @ Following
- whitney @ Loving neta!
- jam_kouchdown @ Love
- drachdubuka
- virginiadofficial These are nice to see
- ladykiss1987 That's turning! I would have never thought of something like this! I guess it's a genius idea!
- Repost @ Artista's impressive
- adriana1987 Love it! I so much!
- london The is so amazing!!
- nicholasvander art shadows yess!

1,234 likes

Share

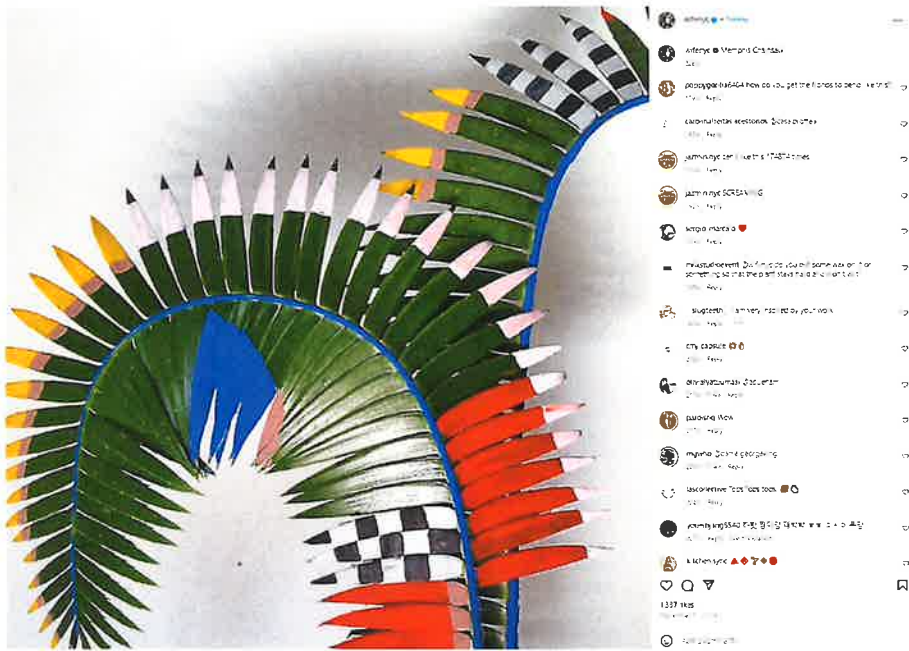


Exhibit C – Group of Published Photographs by Sophia Parker Studios, Inc.
(U.S. Copyright Registration No. VA 2-352-960)

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shirra Perlmutter
United States Register of Copyrights and Director

Registration Number

VA 2-352-960

Effective Date of Registration:

April 27, 2023

Registration Decision Date:

June 30, 2023

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i).

For Photographs Published: September 30, 2019 to November 17, 2019

Title

Title of Group: Memphis Chainsaw Collection
Number of Photographs in Group: 3

- Individual Photographs: I'm Starting a Country. This is the Flag.

Published: September 2019

- Individual Photographs: Sunning Herself
Published: October 2019

- Individual Photographs: Memphis Chainsaw
Published: November 2019

Completion/Publication

Year of Completion: 2019
Earliest Publication Date in Group: September 30, 2019
Latest Publication Date in Group: November 17, 2019
Nation of First Publication: United States

Author

• Author: Sophia Parker Studios, Inc.
Author Created: photographs
Work made for hire: Yes
Citizen of: United States
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Sophia Parker Studios, Inc.
1651 Cody Ave., Flushing, NY, 11385, United States

Rights and Permissions

Organization Name: A. Bruno Law
Address: P.O. Box 468
Easton, PA 18044 United States

Certification

Name: Alyssa M. Bruno
Date: April 27, 2023

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.





